

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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TREMAINE K. WATKINS

Plaintiff,

NOTICE OF REMOVAL  
DOCKET NO.

-against-

CREDIT CORP SOLUTIONS, INC., and  
JOHN DOES 1 TO 10

Defendant.

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**NOTICE OF REMOVAL OF ACTION**

To: THE CLERK OF THE UNITED STATES DISTRICT COURT,  
DISTRICT OF NEW JERSEY

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. Section 1441, *et seq.* defendant, Credit Corp Solutions, Inc. (hereinafter “defendant” or “Credit Corp Solutions”), hereby removes this civil action from the Superior Court of New Jersey, County of Bergen, to the United States District Court for the District of New Jersey.

**I. PROCEEDINGS TO DATE**

On or about May 10, 2016 plaintiff, Tremaine Watkins (hereinafter “plaintiff” or “Watkins”), filed a Summons and Complaint, dated May 10, 2016, in the civil action captioned Tremaine K. Watkins vs. Credit Corp Solutions, Inc., and John Does 1 to 10, Docket No. DC-006204-16, in the Superior Court of the State of New Jersey, County of Bergen. Plaintiff served the defendant, Credit Corp Solutions on or about May 16, 2016. The Complaint alleges

violations of the Fair Debt Collection Practices Act, 15 USC Section 1692, *et seq.*, and seeks statutory damages and attorney fees.

Copies of the summons and complaint are annexed hereto, collectively, as Exhibit “A” as required by 28 USC Section 1446.

## **II. GROUND FOR REMOVAL**

The Court has original jurisdiction over this action because this action arises under a law of the United States. See 28 U.S.C. §1331. This action arises under the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* Accordingly, under 28 U.S.C. §1331, this Court has original jurisdiction over this case.

## **III. VENUE**

Plaintiff’s action is pending in the Superior Court of the State of New Jersey, County of Bergen, which is within this judicial district and division. 28 U.S.C. §112(c). The United States District Court for the District of New Jersey is the District Court and Division within which Credit Corp Solutions may remove this action, pursuant to 28 U.S.C. Section 1441(a) and within which defendant must file this Notice of Removal pursuant to 28 U.S.C. Section 1446(a).

## **IV. TIMELINESS**

This Notice of Removal is timely filed. Plaintiff served a copy of the complaint upon the defendant, Credit Corp Solutions on May 16, 2016, within thirty (30) days of the present Notice of Removal. See 28 U.S.C. Section 1446(b).

**V. NOTICE**

Pursuant to 28 U.S.C. §1446(b), defendant, Credit Corp Solutions is simultaneously filing a copy of this Notice of Removal with the New Jersey Clerk. Plaintiff counsel is also being served with a copy of this Notice of Removal.

**VI. CONCLUSION**

For the foregoing reasons, Credit Corp Solutions respectfully requests that this action, previously pending in the Superior Court of the State of New Jersey, County of Bergen, be removed to this Court, and that this Court proceed as if this case had been originally initiated in this Court.

Dated: New York, NY  
June 14, 2016

Respectfully submitted,

/S/ Brian J. Markowitz  
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**ATTORNEYS FOR DEFENDANT**